

In The Court of Common Pleas of the Western District
Pennsylvania.

Jennifer Ann Fedorek, plaintiff
v.

Civ A. No.
05-186

Warden Ronald Snyder, defendant
C.D. Helene Craft, defendant

Motion for Appointment of Counsel

Pursuant to 28 U.S.C. § 1915(e)(4) plaintiff moves for an order appointing counsel to represent him in this case in support of this motion, plaintiff states:

- 1.) Plaintiff is unable to afford counsel. He has requested leave to proceed in forma pauperis.
- 2.) Plaintiff's imprisonment will greatly limit his ability to litigate. The issues involved in this case are complex, and will require significant research and investigation. Plaintiff has limited access to the law library and limited knowledge of the law.
- 3.) A trial in this case will likely involve conflicting testimony, and counsel would better enable plaintiff to present evidence and cross examine witnesses.

February 7, 2006

Jennifer Ann Fedorek
Jennifer Ann Fedorek # 059802
451 Fullerton Avenue
Cambridge Springs, PA, 16403

05 FEB 28 2006

CLERK
W. DISTRICT COURT